

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

TYLER DIVISION

STRAGENT, LLC, *et al.*,

Plaintiffs,

v.

**PIONEER ELECTRONICS (USA)
INC., *et al.*,**

Defendants.

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Civil Action No. 6:11-CV-278-LED

JURY TRIAL DEMANDED

**STIPULATION TO DISMISS WITHOUT PREJUDICE
DEFENDANT HONDA NORTH AMERICA, INC.**

Pursuant to Fed. R. Civ. P. 29, Plaintiffs Stragent, LLC (“Stragent”) and SeeSaw Foundation (“SeeSaw”), on the one hand, and Defendants Honda North America, Inc. (“Honda NA”), Honda of America Mfg., Inc. (“Honda Mfg.”), American Honda Motor Co. Inc. (“American Honda”), and Honda Motor Company, Ltd. (“Honda Japan”) (collectively “Honda”), on the other hand, hereby stipulate as follows:

1. Honda represents that Honda NA does not make, use, sell or offer to sell in the United States, nor import into the United States, nor has Honda NA ever made, used, sold or offered for sale in the United States, nor imported into the United States, any product accused of infringement in Plaintiffs’ Complaint for Patent Infringement, or any product that is substantially similar;

2. Honda represents that Honda NA is not participating, nor has it ever participated, in the design, development, manufacturing, assembly, testing or maintenance of any product accused of infringement in Plaintiffs’ Complaint for Patent Infringement, or any product that is substantially similar;

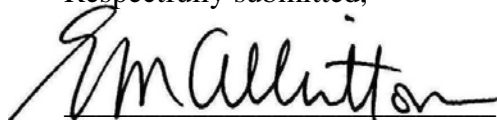
3. Honda agrees that, to the extent that discovery directed to Honda Mfg., American Honda or Honda Japan seeks information in the possession, custody or control of Honda NA but not Honda Mfg., American Honda or Honda Japan, Honda will provide the requested information, subject to Honda Mfg., American Honda or Honda Japan's other objections, by written response, production of documents or witness testimony, as appropriate, and will not object to any such discovery request on the basis that Honda NA is no longer a party to this action;

4. Based on the representations above, Stragent and SeeSaw agree to dismiss without prejudice their claims against Honda NA pursuant to Fed. R. Civ. P. 41(A)(1)(a)(i);

5. Honda NA agrees that, once dismissed from this action, it will not file a declaratory judgment action against Stragent or SeeSaw with respect to U.S. Patent No. 7,953,599, or any other patent claiming priority to U.S. Patent Application No. 12/104,207, unless and until Stragent or SeeSaw reasserts U.S. Patent No. 7,953,599 or any other patent claiming priority to U.S. Patent Application No. 12/104,207 against Honda NA; and

6. Honda agrees that if discovery later shows that Honda NA: 1) is making, using, selling or offering for sale in the United States, or importing into the United States, any product accused of infringement in Plaintiffs' Complaint for Patent Infringement, or any product that is substantially similar; 2) has ever made, used, sold or offered for sale in the United States, or imported into the United States, any product accused of infringement in Plaintiffs' Complaint for Patent Infringement, or any product that is substantially similar; or 3) is participating or has ever participated in the design, development, manufacturing, assembly, testing or maintenance of any product accused of infringement in this action or any product that is substantially similar, Honda will not oppose any motion to add Honda NA to the complaint.

Respectfully submitted,



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***Attorneys for Defendants Honda North America,
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service are being served with a true and correct copy of the foregoing by email, on this the 5th day of October 2011.

A handwritten signature in black ink, appearing to read "E. M. Albritton", written over a horizontal line.

Eric M. Albritton